

June 16, 2015

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Jocelyn Boyd  
Chief Clerk and Administrator  
South Carolina Public Service Commission  
Synergy Business Park, The Saluda Building  
101 Executive Center Drive  
Columbia, SC 29210

Re: 2015 Annual ETC Report of Palmetto Telephone Communications,  
LLC  
Docket Nos. 2012-236-C and 2014-14-C

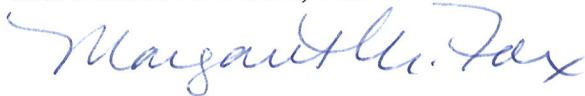
Dear Ms. Boyd:

Enclosed for filing pursuant to S.C. Code Ann. Regs. 103-690.1 please  
find the 2015 Annual ETC Report of Palmetto Telephone Communications, LLC.

Please contact me if you have any questions concerning the attached  
report. Thank you for your assistance.

Very truly yours,

McNAIR LAW FIRM, P.A.



Margaret M. Fox

MMF:dmf

Enclosure

cc: Christopher Rozycki, ORS (w/encls.)  
Valerie Ancrum (w/encls.)

McNAIR LAW FIRM, P.A.  
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BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA

|   |   |                       |
|---|---|-----------------------|
| Application of Palmetto Telephone         | ) |                       |
| Communications, LLC for Designation as an | ) | Docket No. 2012-236-C |
| Eligible Telecommunications Carrier       | ) |                       |
|   | ) |                       |

|   |   |                      |
|---|---|----------------------|
| Request for Certification of the Use of Universal | ) |                      |
| Service Funds Pursuant to 47 C.F.R. 54.314 and    | ) | Docket No. 2014-14-C |
| Telecommunications Act Section 254(e), Federal    | ) |                      |
| Communications Commission CC Docket No.           | ) |                      |
| 96-45 (Form 481); and Annual Reports for ETCs     | ) |                      |

**ANNUAL ETC REPORT OF PALMETTO TELEPHONE COMMUNICATIONS, LLC**

Pursuant to S.C. Code Ann. Reg. § 103-690.1, Palmetto Telephone Communications, LLC (“Palmetto”) hereby files this Annual ETC Report. The South Carolina Public Service Commission (“Commission”) designated Palmetto an Eligible Telecommunications Carrier (“ETC”) by its Order No. 2012-739 in Docket No. 2012-236-C. Palmetto was designated for purposes of receiving low-income (Lifeline) support only, and did not request designation to receive federal High Cost Support. Therefore, pursuant to Reg. § 103-690.1(B)(11), Palmetto must comply with the reporting requirements set forth in Reg. § 103-690.1(B)(3)-(10). Palmetto is providing this report solely for purposes of the state reporting requirement, and will separately comply with all federal reporting requirements that may apply to Palmetto. Palmetto respectfully submits the following:

**103-690.1(b)(3) – Number of requests for service from potential customers that were unfulfilled**

Palmetto had 0 unfulfilled requests for service during the 2014 calendar year.

**103-690.1(b)(4) – Number of complaints or trouble reports per 1000 handsets or access lines**

Palmetto had 0 complaints per 1,000 access lines for the 2014 calendar year.

**103-690.1(b)(5) – Certification of compliance with applicable service quality standards and consumer protection rules**

Attached as Exhibit A is a copy of the Affidavit of Jason J. Dandridge, Chief Executive Officer of Palmetto, certifying that Palmetto is in compliance with applicable service quality standards and consumer protection rules.

**103-690.1(b)(6) – Report and Certification of ability to function in emergency situations**

Attached as Exhibit A is a copy of the Affidavit of Jason J. Dandridge, Chief Executive Officer of Palmetto, certifying that Palmetto is able to remain functional in emergency situations. Palmetto has a reasonable amount of back-up power to ensure functionality without an external power source; is able to reroute traffic around damaged facilities; and is capable of managing traffic spikes resulting from emergency situations.

**103-690.1(b)(7) – Certification regarding provision of comparable local usage plan**

Attached as Exhibit A is a copy of the Affidavit of Jason J. Dandridge, Chief Executive Officer of Palmetto, certifying that Palmetto offers a local usage plan comparable to that offered by the incumbent LEC in the relevant service areas.

**103-690.1(b)(8) -- Certification regarding equal access**

Attached as Exhibit A is a copy of the Affidavit of Jason J. Dandridge, Chief Executive Officer of Palmetto, certifying that Palmetto acknowledges that the Federal Communications Commission may require Palmetto to provide equal access to long distance carriers in the event that no other ETC is providing equal access within the service area.

**103-690.1(b)(9) – Number of Lifeline customers**

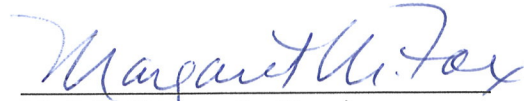
Palmetto had 791 Lifeline customers as of December 31, 2014. Palmetto did not provide Link Up assistance, as that program has been abolished by the Federal Communications Commission.

**103-690.1(b)(10) – Copies of responses to Lifeline Verification Survey or Certification filed with USAC on August 31 of each year**

USAC now requires Lifeline service providers to file the annual verifications required by 47 C.F.R. §54.416 by January 31 of each year. Attached as Exhibit B is a copy of Palmetto's Form 555, which was filed with USAC and with the Commission in January 2015.



Respectfully Submitted,



M. John Bowen, Jr., Esquire

Margaret M. Fox, Esquire

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Attorneys for Palmetto Telephone  
Communications, LLC

June 16, 2015

Columbia, South Carolina

EXHIBIT A

AFFIDAVIT OF JASON J. DANDRIDGE

[illegible]

BEFORE THE  
PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA

Application of Palmetto Telephone )  
Communications, LLC for Designation as an ) Docket No. 2012-236-C  
Eligible Telecommunications Carrier )  
)

Request for Certification of the Use of Universal )  
Service Funds Pursuant to 47 C.F.R. 54.314 and ) Docket No. 2014-14-C  
Telecommunications Act Section 254(e), Federal )  
Communications Commission CC Docket No. )  
96-45 (Form 481); and Annual Reports for ETCs )

## AFFIDAVIT OF JASON J. DANDRIDGE

PERSONALLY APPEARED BEFORE ME the undersigned WHO, BEING DULY  
SWORN, deposed and said:

1. My name is Jason J. Dandridge, and I am a citizen of the State of South Carolina.  
I am of sound mind and am over the age of twenty-one years.
2. I am competent to testify to the matters stated herein.
3. The matters stated herein are based on my personal knowledge.
4. I am the Chief Executive Officer for Palmetto Telephone Communications, LLC  
("Palmetto").

5. I hereby certify that Palmetto is complying with applicable service quality standards and consumer protection rules, as designated by the Public Service Commission of South Carolina (“Commission”).

6. I hereby certify that Palmetto does and will continue to satisfy applicable consumer protection and service quality standards.

7. I hereby certify that Palmetto is able to function in emergency situations. Palmetto has a reasonable amount of back-up power to ensure functionality without an external power source; is able to reroute traffic around damaged facilities; and is capable of managing traffic spikes resulting from emergency situations.

8. I hereby certify that Palmetto is offering local usage plans comparable to those offered by the incumbent LECs in the service areas in which Palmetto provides competitive service.

9. I hereby certify that Palmetto acknowledges that the Federal Communications Commission may require Palmetto to provide equal access to long distance carriers in the event that no other eligible telecommunications carrier is providing equal access within the service area.

[Signature page follows.]

FURTHER AFFIANT SAYETH NOT.

  
\_\_\_\_\_  
Jason J. Dandridge  
Chief Executive Officer  
Palmetto Telephone Communications, LLC

Subscribed to and sworn before me this 9<sup>th</sup> day of June 2015.

Karen L. Bridge  
\_\_\_\_\_  
NOTARY PUBLIC FOR SOUTH CAROLINA

Karen L Bridge  
\_\_\_\_\_  
Printed Name of Notary

My Commission Expires: April 10, 2024



EXHIBIT B

PALMETTO TELEPHONE  
COMMUNICATIONS , LLC

FORM 555, JANUARY 2015

**Annual Lifeline Eligible Telecommunications Carrier Certification Form**

All carriers must complete all or portions of all sections  
Form must be submitted to USAC and filed with the Federal Communications Commission

**IMPORTANT: PLEASE READ INSTRUCTIONS FIRST**

**Deadline: January 31<sup>st</sup> (Annually)**

249023

Study Area Code (SAC)

(An Eligible Telecommunications Carrier (ETC) must provide a certification form for *each* SAC through which it provides Lifeline service).

SC

Palmetto Telephone Communications

State

ETC Name

PTC

Palmetto Rural Telephone Cooperative

DBA, Marketing or Other Branding Name  
(If same as ETC name, list "N/A" Do not leave blank)

Holding Company Name  
(If same as ETC name, list "N/A" Do not leave blank)

**Does the reporting company have affiliated ETCs?**

Yes ☒

No ☐

Provide a list of all ETCs that are affiliated with the reporting ETC, using page 4 and additional sheets if necessary. Affiliation shall be determined in accordance with Section 3(2) of the Communications Act. That Section defines "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person." 47 U.S.C. § 153(2). See also 47 C.F.R. § 76.1200.

| Affiliated ETC's SAC         | Affiliated ETC's Name |
|------------------------------|-----------------------|
| -- See attached worksheet -- |                       |

For purposes of this filing, an officer is an occupant of a position listed in the article of incorporation, articles of formation, or other similar legal document. An officer is a person who occupies a position specified in the corporate by-laws (or partnership agreement), and would typically be president, vice president for operations, vice president for finance, comptroller, treasurer, or a comparable position. If the filer is a sole proprietorship, the owner must sign the certification.

**Section 1: Initial Certification** All ETCs must complete this section

I certify that the company listed above has certification procedures in place to:

- A) Review income and program-based eligibility documentation prior to enrolling a consumer in the Lifeline program, and that, to the best of my knowledge, the company was presented with documentation of each consumer's household income and/or program-based eligibility prior to his or her enrollment in Lifeline; and/or
- B) Confirm consumer eligibility by relying upon access to a state database and/or notice of eligibility from the state Lifeline administrator prior to enrolling a consumer in the Lifeline program.

I am an officer of the company named above. I am authorized to make this certification for the Study Area Code listed above.

Initial DJW

## Section 2: Annual Recertification

Do not leave empty blocks. If an ETC has nothing to report in a block, enter a zero.

| A   | B   | C  | D   | E = (A - B - C - D)  |
|---|---|--|---|--|
| Number of subscribers claimed on February FCC Form 497 of current Form 555 calendar year<br><br>(February data month) | Number of lines claimed on February FCC Form 497 of current Form 555 calendar year provided to wireline resellers | Number of subscribers claimed on the February FCC Form 497 that were <u>initially</u> enrolled in the current Form 555 calendar year<br><br>(These subscribers did not have Lifeline service prior to January 1 of the current 555 calendar year.) | Number of subscribers de-enrolled <u>prior</u> to recertification attempt by either the ETC, a state administrator, access to an eligibility database, or by USAC | Number of subscribers ETC is responsible for recertifying for current Form 555 calendar year |
| 197   | 0   | 37   | 3   | 157  |

### Recertification Results:

| F   | G   | H = (F-G)                            | I  | J = (H+I)  |
|---|---|--------------------------------------|--|--|
| Number of subscribers ETC contacted directly to recertify eligibility through attestation | Number of subscribers responding to ETC contact | Number of non-responding subscribers | Number of subscribers responding that they are no longer eligible<br><br>(This should be a subset of Block G.) | Number of subscribers de-enrolled or scheduled to be de-enrolled as a result of non-response or response of ineligibility from ETC recertification attempt |
| 0   | 0   | 0                                    | 0  | 0  |

| K   | L  |
|---|--|
| Number of subscribers whose eligibility was reviewed by state administrator, ETC access to eligibility database, or by USAC | Number of subscribers de-enrolled or scheduled to be de-enrolled as a result of finding of ineligibility by state administrator, ETC access to eligibility database, or USAC |
| 157   | 124  |

**Note:** If any subscriber was reviewed by an ETC accessing a state database or by a state administrator and subsequently contacted directly by the ETC in an attempt to recertify eligibility, those subscribers should be listed in Blocks F through J as appropriate and not in Blocks K and L. As a result, all subscribers subject to recertification who were not de-enrolled prior to the recertification attempt must be accounted for in Block F or Block K.

The total of Block F and Block K should equal the number reported in Block E.

### Certification:

Based on the data entered above, initial the certification(s) below that apply. Both Certification A and B may apply depending on the recertification procedures in place for the SAC reporting on this form. If Certification C applies, neither Certification A nor B may apply.

A.) I certify that the company listed above has procedures in place to recertify the continued eligibility of all of its Lifeline subscribers, and that, to the best of my knowledge, the company obtained signed certifications from all subscribers attesting to their continuing eligibility for Lifeline. Results are provided in the chart above in Blocks F through J. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above.

Initial DJW

AND/OR

B.) I certify that the company listed above has procedures in place to recertify consumer eligibility by relying on: USAC. Results are provided in the chart above in Blocks K through L. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above.

Initial DJW

OR

C.) I certify that my company did not claim federal low income support for any Lifeline subscribers for the February Form 497 data month for the current Form 555 calendar year. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above.

Initial \_\_\_\_\_



### Section 3: De-enroll Percentage

Using the data entered in Section 2, complete the chart below to find the percentage of subscribers de-enrolled for this ETC.

| $M = (F+K)$  | $N = (J+L)$   | $O = ((N \div M) * 100)$  |
|--|---|---|
| Number of subscribers that the ETC attempted to recertify directly <u>or</u> through a state administrator, ETC access to a state database, or by USAC<br>(This should equal the number reported in Block E) | Number of subscribers de-enrolled or scheduled to be de-enrolled as a result of non-response or ineligibility | Percentage of subscribers de-enrolled or scheduled to be de-enrolled as a result of ineligibility or non-response |
| 157  | 124   | 78.99   |

### Section 4: Pre-Paid ETCs

All ETCs must complete the appropriate check-box; pre-paid ETCs must complete all of Section 4. Pre-paid ETCs generally do not assess or collect a monthly fee from their Lifeline subscribers. ETCs that only assess a fee but do not collect such fees are pre-paid ETCs and must complete the chart below.

Is the ETC Pre-Paid? Yes ☒ No ☒

If Yes, record the number of subscribers de-enrolled for non-usage by month in Block Q below.

| P                 | Q                                     |
|-------------------|---------------------------------------|
| Month             | Subscribers De-Enrolled for Non-Usage |
| January           | 0                                     |
| February          | 0                                     |
| March             | 0                                     |
| April             | 0                                     |
| May               | 0                                     |
| June              | 0                                     |
| July              | 0                                     |
| August            | 0                                     |
| September         | 0                                     |
| October           | 0                                     |
| November          | 0                                     |
| December          | 0                                     |
| Total Subscribers | 0                                     |

### Signature Block

By signing below, I certify that the company listed above is in compliance with all federal Lifeline certification procedures. I am an officer of the company named above. I am authorized to make this certification for the Study Area Code (SAC) listed above.

Signed,

Dewaine J Wilson, CFO

\_\_\_\_\_  
Signature of Officer  
dewaine.wilson@prtc.coop  
\_\_\_\_\_  
Email Address of Officer  
Valerie Ancrum  
\_\_\_\_\_  
Person Completing This Certification Form

\_\_\_\_\_  
Printed Name and Title of Officer  
01/07/2015  
\_\_\_\_\_  
Date  
843-538-9383  
\_\_\_\_\_  
Contact Phone Number

[illegible]